

EXHIBIT B

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JOSEPH P. GREENLEY JR.,	:	Civil No. 3:16-cv-04454-AET-DEA
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
TOMS RIVER KIA;	:	
	:	
Defendants.	:	

PLAINTIFF'S RULE 26(a) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a), Plaintiff hereby discloses to Defendants the following:

(A) Names and Addresses of All Persons with Pertinent Knowledge

At present, plaintiff has identified the following persons, in addition to plaintiffs, as being reasonably likely to have discoverable information that plaintiffs may use to support its claims in this matter. As to the individuals who are relatives or friends of relatives of the plaintiffs, plaintiffs do not consent to defendants contacting the persons named below, except through plaintiffs' counsel of record.

1. TOMS RIVER KIA ("TRK"), a corporation, seller and assignor of the underlying retail installment contract of the subject defective vehicle, and an artificial person, and its employees and agents whose identities are not yet fully known but whom, upon information and belief, conduct business at the address noted in the complaints. TRK has knowledge of the factual circumstances of the subject pre-sale acquisition, inspection and repair practice and procedures for used vehicles and of the specific pre-sale acquisition, inspection and repair of the subject vehicle as well as its sale to plaintiff.

2. BOB SALMON, regarding an inspection/appraisal of damage/valuation of the subject vehicle.

All other persons disclosed by Defendants. Discovery continues. Plaintiffs' investigation into persons reasonably likely to have discoverable information that defendant may use to support their claims is continuing.

(B) Documents Relevant to Disputed Facts Alleged

Based on current information and belief and after reasonable investigation, the following responsive documents are in plaintiff's possession or control:

1. All documents attached to Plaintiff's Complaint as exhibits filed herein and incorporated by reference, if any.
2. All purchase documents regarding the subject vehicle.
3. All documents in the possession or control of Defendant that contain any information regarding the subject vehicle and Plaintiff's account.
4. Copies of all Better Business Bureau complaints, Federal Trade Commission complaints, lawsuits, demand letters, or any other document evidencing or alleging liability on the part of Defendant or its employees for violations of state consumer law, formal or informal, for a period from five (5) years prior to the filing of this lawsuit through today, by any person, agency, or entity which related to defendants identifying and collecting/repossessing upon a consumer for repossession purposes.
5. All training manuals or documents for technician employees.
6. All inspection, sales, and acquisition practices and procedure handbooks, manuals, or other documents created or adopted by defendants for the time period relevant to sale of the subject vehicle to plaintiff.

7. All employee handbooks and training manuals as to calculation of sales tax for TRK vehicle purchase transactions on or prior to the date of sale of the subject vehicle.

Plaintiff's investigation relating to documents, data compilations and tangible things which may be used to support its claims is continuing and plaintiff reserves the right to supplement these disclosures according to the Federal Rules of Civil Procedure.

(C) Any Insurance Agreement That May Be Used To Satisfy Part Or All Of A Judgment That May Be Entered In This Action, Or To Indemnify Or Reimburse For Payments Made To Satisfy The Judgment:

Plaintiff awaits disclosures of defendants in this regard.

(D) Damages

1. \$6,537 diminished value as actual damages.
2. Mandatory treble damages under the CFA or \$19,611
3. Attorney fees and costs.

By: /s/Matthew B. Weisberg
Attorney for Plaintiff
(610) 690-0801